From: Jim Wiltschko
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 9:33:22 PM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

* remove the exception that makes compliance with the regulation optional;

* replace the proposed recusal requirement with a broader 5- year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have
substantial interests;

* remove the offensive example involving an accused sexual harasser:

* and place nonprofit charities (501(c)(3) organizations) on an
equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.